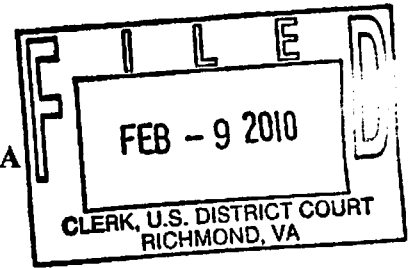


**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**



LESLIE MCINTOSH,

Plaintiff,

v.

Civil Action No. 3:10CV082-HEH

GC SERVICES LIMITED PARTNERSHIP,

Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

INTRODUCTION

1. This is an action by a consumer alleging damages and declaratory relief for Defendant's violations of the Fair Debt Collections Practices Act ("FDCPA"), 15 U.S.C. §§1692 et seq., which prohibits debt collectors from engaging in abusive, deceptive, and unfair collection practices.

JURISDICTION

2. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, and the FDCPA, 15 U.S.C. §1692k(d).

PARTIES

3. Plaintiff Leslie McIntosh ("Ms. McIntosh") is a natural person who resides in the Commonwealth of Virginia. Ms. McIntosh is a consumer within the meaning of the FDCPA, as defined at 15 U.S.C. § 1692a(3).

4. Upon information and belief, GC Services Limited Partnership ("GC Services") is a partnership with its primary headquarters in Texas and which does business in the Commonwealth of Virginia through its registered offices in Glen Allen, Virginia.

5. Defendant regularly collects or attempts to collect debts owed or due or asserted to be owed or due another, and are “debt collectors” within the meaning of the FDCPA, as defined at 15 U.S.C. § 1692a(6).

STATEMENT OF FACTS

6. GC Services sent Ms. McIntosh an April 30, 2009 dunning letter attempting to collect on a consumer debt.

7. The debt, was for a student loan, and was incurred primarily for personal, family, or household purposes, bringing Defendant’s collection efforts within the purview of the FDCPA. 15 U.S.C. § 1692a(5).

8. Ms. McIntosh sent GC Services a May 5, 2009 letter advising that she disputed the debt and that she wished GC Services to cease further communication with her.

9. GC Services received Plaintiff’s letter on May 11, 2009.

10. On or about May 29, 2009, GC Services wrote Plaintiff in an attempt to collect the subject debt.

11. On or about May 5, 2009, GC Services contacted Plaintiff’s father by telephone in connection with the collection of the subject debt from the Plaintiff.

12. On or about May 8, 2009, GC Services telephoned Plaintiff’s parents in connection with the collection of the subject debt, and left a voice mail message for Plaintiff to call GC Services back.

13. On or about May 8, 2009, GC Services telephoned Plaintiff’s mother in connection with the collection of the subject debt, and advised Plaintiff’s mother that the caller was attempting to reach the Plaintiff about a business matter.

14. As a result of the acts and omissions of the Defendant, Ms. McIntosh has suffered actual damages and injury, including but not limited to, emotional distress, frustration, and lost time.

15. The foregoing acts and omissions of the Defendant constitutes violations of the FDCPA, including, but not limited to, violations of § 1692g, and g(b).

PRAYER FOR RELIEF

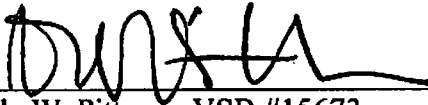
WHEREFORE, Plaintiff requests that the Court grant the following relief:

1. Declaratory relief that the Defendant violated the Fair Debt Collection Practices Act;
2. Award Plaintiff statutory damages and actual damages against the Defendant for its violations of the Fair Debt Collection Practices Act;
3. Award Plaintiff reasonable attorneys' fees against the Defendant for its violations of the Fair Debt Collection Practices Act;
4. Award Plaintiff costs against the Defendant for its violations of the Fair Debt Collection Practices Act;

5. Such other relief as may be just and proper.

TRIAL BY JURY IS DEMANDED

Respectfully submitted,
Leslie McIntosh
By Counsel



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